



ELLENANN B. YELVERTON
Vice President/General Counsel

May 18, 2018

By ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**Re: Modernization of Media Regulation Initiative, MB No. 17-105;
2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership
Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act
of 1996, MB Docket No. 14-50**

Dear Ms. Dortch:

On May 15, 2018, Ann West Bobeck, counsel to Raycom Media, Inc. (“Raycom”), and the undersigned had meetings with the following persons: Brooke Ericson, Chief of Staff, Office of Commissioner O’Rielly; and Evan Swarztrauber, Policy Advisor, Office of Commissioner Carr. Additionally, we met with the following Media Bureau personnel: Michelle Carey, Barbara Kreisman, David Brown, Mary Beth Murphy, Sarah Whitesell, and Brendan Holland. On May 16, 2018, we separately met with Kate Black, Policy Advisor, Media, Office of Commissioner Rosenworcel; and Alison Nemeth, Media Advisor, Office of Chairman Pai.

The purpose of the meetings was to introduce myself to the staff and generally discuss regulatory matters of interest to Raycom. Specifically, we thanked the Commission for their continued efforts to identify and eliminate outdated broadcast regulations. We also expressed our appreciation for the Commission’s efforts to review the children’s television programming rules. Raycom is committed to serving children in all communities in which Raycom operates television stations. We also support the Children’s Television Act of 1990 and its directive to promote educational and informative (“E/I”) children’s programming.

Since the rules were first implemented in 1996¹, the media landscape has radically changed. With the advent of video on demand, over-the-top services, iPads, mobile phones, YouTube, as well as dedicated children’s programming providers such as Disney, Nickelodeon, and PBS, the availability of quality E/I programming has been greatly expanded. Thus, it is appropriate for the Commission to examine how today’s children access E/I programming and accordingly adjust its regulations, if appropriate. We urged the Commission to consider giving broadcasters greater flexibility in E/I programming on multicast streams, so that they can continue to deliver quality E/I programming, including to U.S. households that solely rely on our over-the-air broadcast television service.

¹ See Policies and Rules Concerning Children’s Television Programming, *Report and Order*, 1 FCC Rcd 10660 (1996).

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Additionally, we discussed the Commission's 2017 Ownership Order on Reconsideration², and the positive impact modest deregulation has brought to the broadcast industry. Raycom has recently acquired over 110 newspapers, including seven in markets where such a combination would not have been available due to the newspaper-broadcast cross ownership prohibition.

Finally, we thanked the Commission for authorizing ATSC 3.0 service and discussed potential ways that Next-Generation television may develop in the coming years. Raycom Media looks forward to working closely with the Commission to ensure that its regulations continue to reflect the current media environment and also enable broadcasters to continue to serve their local communities.

Please reach out if you have any questions.

Respectfully submitted,



ELLENANN B. YELVERTON

² See 2014 Quadrennial Regulatory Review, *Order on Reconsideration and Notice of Proposed Rulemaking*, 2 FCC Rcd 9802 (2017).